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17 Attorneys for Plaintiffs
 CORY SPENCER, DIANA MILENA
 18 REED, and COASTAL PROTECTION
 RANGERS, INC.
 19

20 **UNITED STATES DISTRICT COURT**
 21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 22

23 CORY SPENCER, an individual;
 24 DIANA MILENA REED, an
 individual; and COASTAL
 25 PROTECTION RANGERS, INC., a
 26 California non-profit public benefit
 corporation,
 27

28 Plaintiffs.

CASE NO. 2:16-cv-02129-SJO (RAOx)

**DECLARATION OF VICTOR OTTEN
 IN SUPPORT OF TELEPHONIC
 HEARING ON PLAINTIFFS'
 DISCOVERY DISPUTE WITH
 DEFENDANT SANG LEE**

1
2 v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including but
6 not limited to SANG LEE, BRANT
7 BLAKEMAN, ALAN JOHNSTON
8 AKA JALIAN JOHNSTON,
9 MICHAEL RAE PAPAYANS,
10 ANGELO FERRARA, FRANK
11 FERRARA, CHARLIE FERRARA,
12 and N. F.; CITY OF PALOS
13 VERDES ESTATES; CHIEF OF
14 POLICE JEFF KEPLEY, in his
15 representative capacity; and DOES
16 1-10,

17 Defendants.

18
19 I, VICTOR OTTEN, declare as follows:

20 1. I am attorney licensed to practice under the laws of the State of
21 California and am duly admitted to practice before this court. I am an
22 attorney of record for Plaintiffs Cory Spencer, Diana Milena Reed, and the
23 Coastal Protection Rangers, Inc. I have personal knowledge of the facts set
24 forth herein, and if called as a witness, I could and would competently testify
25 to the matters stated herein.

26 2. This declaration is being submitted pursuant to Minutes Of
27 Telephone Conference held before Magistrate Judge Rozella A. Oliver
28 Document No. 267.

29 3. Attached to this declaration as **Exhibit 1** is a true and correct
30 copy of the first meet and confer letter dated December 20, 2016 sent by my
31 co-counsel to Defendant Sang Lees attorneys regarding Responses to
32 Plaintiffs Request for Production of Documents. Set One.

